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February 29, 2016

- VIA ECF -

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
Hon. Magistrate Judge Scanlon  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: LEE v. ENTERPRISE HOLDINGS, INC. and PHILIP CATALDI, Trustee of the  
PHILIP CATALDI Trust #2  
Docket Number: 14-CV-03931

Dear Judge Scanlon:

Enclosed herewith are plaintiff's proposed voir dire and jury instructions.

Plaintiff will submit Hospital Records into evidence and will seek to submit medical illustrations of plaintiff's open reduction internal fixation surgery. These medical illustrations were done specifically based on plaintiff's operative report and Dr. Joseph Shim, plaintiff's treating orthopedic surgeon, will affirm that these illustrations are reasonably anatomically correct, fairly and accurately depict plaintiff's surgery and will assist him in helping the jury understand injuries suffered by plaintiff as a result of the accident. The medical illustrations will further assist Dr. Shim in explaining the surgery that he performed as well as his surgical technique.

Thank you.

Very truly yours,



Jeffrey Kim

JK/ssr